



faegredrinker.com

Susan M. Sharko
Partner
susan.sharko@faegredrinker.com
+1 973 549 7350 direct

Faegre Drinker Biddle & Reath LLP
600 Campus Drive
Florham Park, New Jersey 07932
+1 973 549 7000 main
+1 973 360 9831 fax

January 4, 2024

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices and Products Liability Litigation*
Case No.: 3:16-md-02738-MAS-RLS

Dear Judge Singh,

I am writing to request leave of Court for defendants to file a ten-page reply in support of their Motion to Strike Plaintiffs' Improper Supplemental Reports. (ECF No. 28798.) Plaintiffs' response (ECF No. 28857) raises a number of arguments that defendants seek to address, including their claim that their new experts and "supplemental" opinions are justified by defendants' bankruptcy petitions and their suggestion that any prejudice from these late disclosures "can easily be cured." A reply would ensure that the Court has critical information necessary to resolve the present dispute regarding the propriety of plaintiffs' expert disclosures.

Because defendants' motion has been set for hearing on January 16, defendants propose that if the Court grants them leave to file a reply, the reply would be filed by January 9.

Respectfully submitted,

A handwritten signature in black ink that reads "Susan Sharko". The signature is written in a cursive, flowing style.

Susan M. Sharko

SMS/emf

cc: All Counsel (via ECF)